

To: Engelman, Alexa[ENGELMAN.ALEXA@EPA.GOV]
Cc: Quast, Sylvia[Quast.Sylvia@epa.gov]; Moffatt, Brett[Moffatt.Brett@epa.gov]; Turner, Justin@DOC[Justin.Turner@conservation.ca.gov]; Findley, Timothy@DOC[Timothy.Findley@conservation.ca.gov]; St. Michel, Graham@DOC[Graham.StMichel@conservation.ca.gov]
From: Reeves, Bruce@DOC
Sent: Tue 3/10/2015 4:50:07 AM
Subject: Re: Regional v. DC handling of aquifer exemptions

Thanks, Alexa.

Our big Legislative Oversight hearing is tomorrow, so I may be slow getting back to you.

Typed by thumb. Fair warning.

On Mar 9, 2015, at 4:54 PM, Engelman, Alexa <ENGELMAN.ALEXA@EPA.GOV> wrote:

Bruce:

I just left you another message in response to your inquiry and as I mentioned, Guidance 34 (still current) provides some guidelines for aquifer exemption requests but as the guidance itself states, EPA's determination of whether a sub-3,000 TDS aquifer exemption request is substantial or non-substantial depends on fact specific situations that do not lend to bright line categories in all circumstances.

Please feel free to call me to discuss further, I am available 11am-1pm tomorrow and 3-5pm.

Best,

Alexa

From: Reeves, Bruce@DOC [mailto:Bruce.Reeves@conservation.ca.gov]
Sent: Monday, March 09, 2015 1:54 PM
To: Quast, Sylvia; Engelman, Alexa; Moffatt, Brett
Cc: Turner, Justin@DOC; Findley, Timothy@DOC; St. Michel, Graham@DOC
Subject: RE: Regional v. DC handling of aquifer exemptions

Alexa, got your voice mail, but am off to yet another meeting.

My questions:

Does page 2 of the Kimm memo still apply? Specifically, I'm interested in whether item 1(c) at the bottom of that page (i.e., whether the application is "not related to a permitting action") still determines whether a sub-3,000 exemption will stay in the Region or go to D.C.

And if those criteria still apply, will our applications for such sub-3,000 AEs be considered "related to a specific permitting action"?

Thanks,

BR

From: Reeves, Bruce@DOC
Sent: Saturday, March 7, 2015 11:21 PM
To: Quast, Sylvia; Engelman, Alexa; Moffatt, Brett
Cc: Turner, Justin; Findley, Timothy@DOC; St. Michel, Graham@DOC
(Graham.StMichel@conservation.ca.gov)
Subject: Regional v. DC handling of aquifer exemptions

Sylvia, et al:

I'm looking anew at AE application processes from the point that the application leaves our end. I have a question about what must go to DC or can stay in the Region.

Attached is a Victor Kimm memo from back in 1983 indicating that some post-primacy AEs that the Region may have wanted to handle would have to go back east. Presumably, some new statement of policy has emerged in the years since, supporting greater authority of the Region to keep the AE applications in the Region. Would you mind indulging me and sending me that reg, guidance, or other subsequent policy stuff?

I'm just returning to this issue after a long stretch, so please forgive me if the answer is obvious. Sometimes it's just easier to go to the source than it is to start combing through documents, and my guess is you may have this at your collective fingertips.

Bruce